

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

The Bank of New York Mellon, solely in its capacity as  
Trustee for the TV Azteca, S.A.B. de C.V. 8.25% Senior  
Notes Due 2024,

Plaintiff,

No. 22-cv-08164-PGG

-vs.-

TV Azteca, S.A.B. de C.V.; Administradora Grupo TVA,  
S.A. de C.V.; Alta Empresa, S.A. de C.V.; Asesoría  
Especializada En Aviación, S.A. de C.V.; Atlético Morelia,  
S.A. de C.V.; Azteca Conecta Producciones, S.A. de C.V.;  
Azteca Novelas, S.A.P.I. de C.V.; Azteca Records, S.A. de  
C.V.; Azteca Telecasting, S. de R.L. de C.V.; Azteca Web,  
S.A. de C.V.; Club De Futbol Rojinegros, S.A. de C.V.;  
Comerciacom, S.A. de C.V.; Estudios Azteca, S.A. de C.V.;  
Finbor México, S.A. de C.V.; Ganador Azteca, S.A.P.I. de  
C.V.; Grupo TV Azteca, S.A. de C.V.; Inversora Mexicana  
De Producción, S.A. de C.V.; Operadora Mexicana De  
Televisión, S.A. de C.V.; Organización De Torneos y  
Eventos Deportivos, S.A. de C.V.; Producciones Azteca  
Digital, S.A. de C.V.; Producciones Especializadas, S.A. de  
C.V.; Productora De Televisión Regional De Tv Azteca,  
S.A. de C.V.; Profesionales y Administrativos en Servicios  
Inmobiliarios, S.A. de C.V.; Promotora de Futbol  
Rojinegros, S.A. de C.V.; Promotora de Futbol Morelia,  
S.A. de C.V.; Publicidad Especializada en Medios de  
Comunicación de TV Azteca, S.A. de C.V.; S.C.I. de  
México, S.A. de C.V.; Servicios Aéreos Noticiosos, S.A. de  
C.V.; Servicios Especializados Taz, S.A. de C.V.; Servicios  
y Mantenimiento del Futuro en Televisión, S.A. de C.V.;  
Televisión Azteca, S.A. de C.V.; TV Azteca  
Comercializadora, S.A. de C.V.; Corporación de Asesoría  
Técnica y de Producción, S.A. de C.V.; Comercializadora  
De Publicidad Azteca, S.A. de C.V.; Comercializadora en  
Medios de Comunicación de TV Azteca, S.A. de C.V.;  
Editorial Mandarina, S.A. de C.V.; Multimedia,  
Espectáculos y Atracciones, S.A. de C.V.; Red Azteca

Internacional, S.A. de C.V.; Servicios Foráneos de Administración, S.A. de C.V.; Servicios Locales De Producción, S.A. de C.V.; Agencia Azteca, Inc.; Azteca America TV Spot Sales; Azteca International Corporation; Azteca Stations, LLC; Stations Group, LLC; SCTV, Inc.; Kaza Azteca America Inc.; Southern California TV LLC; Fundacion Azteca America, LLC; TV Azteca Honduras, S.A. de C.V.; Comercializadora de Televisión de Honduras, S.A. de C.V.; Incotel S.A.; TVA Guatemala S.A.; Lasimex, S.A. de C.V.; TV Azteca Global, S.L.U.; Azteca Comunicaciones Perú, S.A.C.; Redes Opticas, S.A.C.; and Televisora del Valle de México, S.A. de C.V.,

Defendants.

### **SUGGESTION OF BANKRUPTCY**

Plaintiff's counsel hereby notifies the Court that, on March 20, 2023 (the "Petition Date"), involuntary chapter 11 petitions for bankruptcy (the "Involuntary Petitions") were filed against the defendants in the above-captioned action (the "Debtors") under title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Southern District of New York. A list of the case names and numbers for the Debtors' chapter 11 cases is attached hereto as Exhibit A.

Pursuant to section 362 of the Bankruptcy Code, the filing of the Involuntary Petitions on March 20, 2023, operates as a stay of, among other things: (a) the commencement or continuation of all judicial, administrative or other actions or proceedings against the Debtors (i) that were or could have been commenced before the Petition Date or (ii) to recover any claims against the Debtor that arose before the Petition Date; (b) the enforcement, against the Debtors or against any property of the Debtors' bankruptcy estates, of a judgment obtained before the Petition Date; or (c) any act to obtain possession of property of or from the Debtors' bankruptcy

estates, or to exercise control over property of the Debtor's bankruptcy estates (the "Automatic Stay").

The Automatic Stay applies to the above-captioned action.

Dated: New York, New York  
March 21, 2023

Respectfully submitted,  
AKIN GUMP STRAUSS HAUER & FELD LLP

/s/ Abid Qureshi

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